

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MICHAEL D. COHEN,

Plaintiff,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

Civil Action No.: 1:21-cv-10774-LJL

NOTICE OF MOTION

PLEASE TAKE NOTICE that the defendant, Donald J. Trump, former President of the United States (“Defendant”), hereby moves, pursuant to Rule 26(c) of the Federal Rules of Civil Procedure for an order (i) granting a stay of all discovery proceedings in this matter until this Court issues a ruling on Defendant’s pending Motion to Dismiss; (ii) granting an interim stay of all discovery proceedings in this matter until this Court issues a ruling on the instant motion; and (iii) for all other relief that the Court deems equitable and proper. This motion is supported by the annexed memorandum of law and any arguments or evidence presented in reply, and all arguments or evidence presented at a hearing or with leave of Court

Dated: May 12, 2022



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